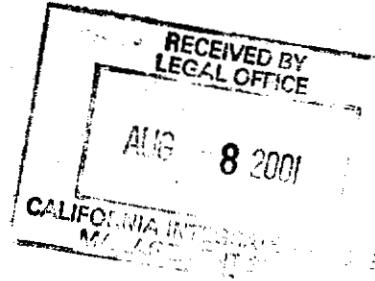
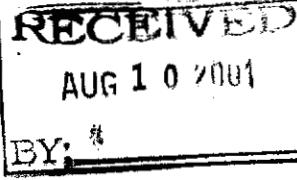


Special Meeting  
May 9, 2002

Agenda Item 1  
Attachment 4

# Request For Hearing



**NOTICE OF DEFENSE PURSUANT TO GOVERNMENT CODE SECTION 11506**

Nevada Tire Recycling, a Nevada Corporation

I, Kirk Cofer, doing business as Nevada Tire Recycling, acknowledge service of the accusation.

Object to accusation upon ground it does not state acts or omissions upon which agency may proceed.

Object to form of accusation upon ground that it is so indefinite or uncertain that I cannot identify transaction or prepare defense.

Admit accusation in whole or in part.

Present new matter by way of defense.

Object to accusation upon ground that, under the circumstances, compliance with the requirements of a regulation would result in a material violation of another regulation enacted by another department affecting substantive rights.

Request a hearing.

Additionally, The Accusation Process Violates our agreement dated February 29, 2000. The citation on which the accusation is based has not been heard in Court and the citation is totally wrong as a matter of law. The delay in granting my permit damages the corporation and is unfair. Even if the citation were true, which it is not, the alleged malfeasance is not sufficient grounds to deny the permit.

Nevada Tire Recycling  
by: Kirk Cofer President

\_\_\_\_\_  
Respondent

DATE:

